

**EXHIBIT A**

**R. Kraft E-Mail Correspondence, dated September 17, 2021**

## Roger Higgins

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**From:** Rune Kraft <rk@kraft.legal>  
**Sent:** Friday, September 17, 2021 2:27 PM  
**To:** Roger Higgins  
**Cc:** 'James O'Neill'  
**Subject:** RE: Kraft - Second Contempt Motion

Mr. Higgins,

Your activities rests on void orders due to lack of jurisdiction, as you know, and the Article I court knows.

It is reasonably foreseeable that your activities may cause damages, and you are urged to take appropriate corrective actions i.e., if you want to initiate an action against me, get a court to issue a summons, write a complaint, and serve me with the summons and complaint.

Thanks,

Rune

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**From:** Roger Higgins <rhiggins@rogerhigginslaw.com>

**Sent:** Friday, September 17, 2021 4:03 PM

**To:** Rune Kraft <rk@kraft.legal>

**Cc:** Ingrid.Aronson@Kraft.Legal; 'James O'Neill (jo'neill@pszjlaw.com)' <jo'neill@pszjlaw.com>

**Subject:** Kraft - Second Contempt Motion

Mr. Kraft,

You will by now have received notice by e-mail of the filing of the Reorganized Debtor's second motion for contempt. This motion, unlike the prior motion, seeks sanctions against you personally in the per diem amount of \$1,000 for each day until you file a pleading seeking Grace's dismissal with prejudice from the Arizona litigation.

The hearing date is October 1, 2021, at 11:00 am ET. The objection deadline is September 24, 2021, one week from today.

Here is the docket entry.

Notice of Electronic Filing

The following transaction was received from James E O'Neill entered on 9/17/2021 at 3:47 PM EDT and filed on 9/17/2021

**Case Name:** W.R. Grace & Co., et al.

**Case Number:** [01-01139-AMC](#)

**Document Number:** [33269](#)

**Docket Text:**

*Motion For Contempt // The Reorganized Debtors Motion for an Order Finding That Rune Kraft is in Contempt of This Court By Willfully and Knowingly Violating This Courts Confirmation Order and Its Orders of August 26, 2021 [Docket No. 33256] and September 8, 2021 [Docket No. 33265] and Imposing Sanctions (related document(s)[33256], [33265], [33266]) Filed by W.R. Grace & Co., et al.. Objections due by 9/24/2021. (Attachments: # (1) Notice # (2) Exhibit A - Proposed Order # (3) Exhibit B # (4) Exhibit C # (5) Exhibit D # (6) Exhibit E # (7) Exhibit F # (8) Exhibit G # (9) Exhibit H # (10) Certificate of Service and Service List) (O'Neill, James)*

Warmest Regards. R

Roger J. Higgins  
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